

1 WILLIAM H. PRUITT, ESQ.  
2 Nevada Bar No. 6783  
3 JOSEPH R. MESERVY, ESQ.  
4 Nevada Bar No. 14088  
5 BARRON & PRUITT, LLP  
6 3890 West Ann Road  
North Las Vegas, Nevada 89031  
Telephone: (702) 870-3940  
Facsimile: (702) 870-3950  
E-Mail: [bpruitt@lvnvlaw.com](mailto:bpruitt@lvnvlaw.com)  
*Attorneys for Defendant*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

9 ELIZABETH POOLE, as Individual Assignee of  
10 Rights of RENE ARGUELLES JR.,

| Case No: 2:24-cv-01981-CDS-BNW

11 Plaintiff,  
vs.

**STIPULATION AND ORDER TO  
EXTEND BRIEFING DEADLINE  
(First Request)**

12 PROGRESSIVE DIRECT INSURANCE  
13 COMPANY, an Ohio Corporation; DOES 1-10, and  
ROE CORPORATIONS 1-10, inclusive.

[ECF No. 10]

## Defendants.

**STIPULATION AND ORDER TO EXTEND BRIEFING DEADLINE**

16 Plaintiff Elizabeth Poole, by and through her attorneys of record, BROCK K. OHLSON PLLC,  
17 and Defendant Progressive Direct Insurance Company, by and through its attorneys of record,  
18 BARRON & PRUITT, LLP, hereby agree and stipulate to extend the deadline for Defendant  
19 Progressive Direct Insurance Company to file a Response to Plaintiff's Motion to Remand (Docket  
#8).

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1 Plaintiff's Motion to Remand was filed on November 22, 2024, with a Response currently due  
 2 December 6, 2024. Plaintiff does not oppose Defendant Progressive Direct Insurance Company's  
 3 request for an extension up to and including December 13, 2024 to allow Defendant Progressive Direct  
 4 Insurance Company to file a response to said motion. Additional time is needed due to time off for  
 5 the Thanksgiving holiday, as well as impediments relating to Counsel's preparation and attendance  
 6 for an arbitration hearing in another matter.

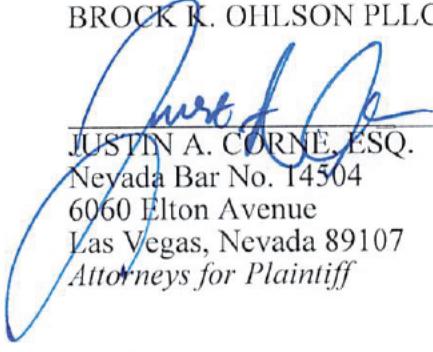
7 Dated this 6<sup>th</sup> day of December, 2024

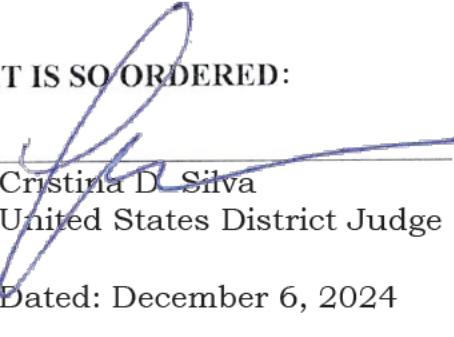
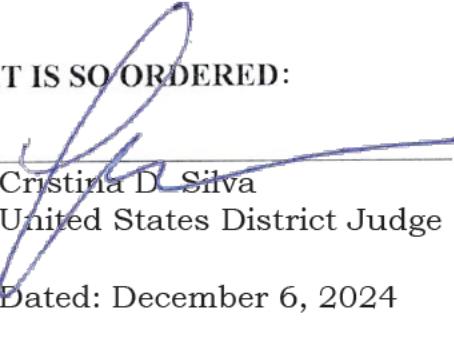
8 BARRON & PRUITT, LLP

9  
 10 */s/ William H. Pruitt*  
 WILLIAM H. PRUITT, ESQ.  
 Nevada Bar No. 6783  
 11 3890 West Ann Road  
 North Las Vegas, Nevada 89031  
 12 *Attorneys for Defendant*

Dated this 6<sup>th</sup> day of December, 2024

BROCK K. OHILSON PLLC

  
 JUSTIN A. CORNE, ESQ.  
 Nevada Bar No. 14504  
 6060 Elton Avenue  
 Las Vegas, Nevada 89107  
*Attorneys for Plaintiff*

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 14 IT IS SO ORDERED:  
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 Cristina D. Silva  
 17 United States District Judge  
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 Dated: December 6, 2024  
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